

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ZAVIUS AVERETTE, #217905)	
)	
Plaintiff,)	
)	
V.)	2:06-CV-399-MHT
)	
LT. WILLIE COPELAND, et al.,)	
)	
Defendants.)	

AFFIDAVIT

State of Alabama :

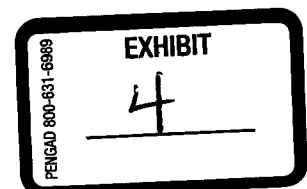
Elmore County :

Before me, the undersigned authority, a Notary Public in and for said County and State of Alabama at Large, personally appeared Relford Kendrick, who being known to me and being by me first duly sworn, deposes and says on oath as follows:

My name is Relford Kendrick. I am presently employed as a Correctional Officer I with the Alabama Department of Corrections at Staton Correctional Facility, P.O. Box 56, Elmore, Alabama 36025. I am over twenty-one years of age and have personal knowledge of the facts set forth below.

I have reviewed the complaint of Inmate Zavius Averette and this is my response to his complaint.

In this civil action, Inmate Averette makes no specific complaint against me, but I understand from reading his complaint that he claims that I had knowledge of his alleged physical and verbal abuse by Lt. Copeland.



Inmate Zavius Averette was escorted to the Shift Commanders' Office by Lt. Copeland and reprimanded for a violation of rule #38-Indecent Exposure/Exhibitionism and rule violation #50-Being in an Unauthorized Area. Lt. Copeland instructed Officer Kendrick to escort Inmate Averette to the Health Care Unit to receive a body chart and then place inmate Averette in the Holding Unit pending disciplinary action. At no time did I see Lt. Copeland neither strike Inmate Averette nor was there any noticeable bruises to substantiate Inmate Averette allege claim.

At no time did I beg Inmate Averette for any bloody clothes nor place any bloody clothes in a brown paper bag as was alleged by Inmate Averette.

To my knowledge, the above-related facts are the entirety of my involvement with Inmate Averette concerning the allegations on which his complaint is based.

I deny that I have violated any well-established civil rights of Inmate Averette.


RELFO RD/KENDRICK

SWORN TO and SUBSCRIBED before me this 26th day of June 2006.


NOTARY PUBLIC

4/4/10
My Commission Expires: